



October 4, 2012

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, S.W.  
Room TW-A325  
Washington, D.C. 20554

In the Matter of: Nomination for Universal Service Administrative Company Board of Directors,  
CC Docket Nos. 97-21 and 96-45

Nomination for Representative for Low-Income Consumers

Dear Ms. Dortch:

I am pleased to nominate Ellis Jacobs, Senior Attorney with Advocates for Basic Legal Equality, Inc. of Dayton, Ohio, for another term as the representative for low-income consumers on the Board of Directors of the Universal Service Administrative Company ("USAC"). A copy of Mr. Jacobs' resume is attached. I hold the state position of Ohio Consumers' Counsel, for the Office of the Ohio Consumers' Counsel, the statutory representative of Ohio's residential utility consumers.

Mr. Jacobs has been the representative for low-income consumers on the USAC Board of Directors since 2009. During that time, he has been a member of the Board's high cost/low-income committee and has played an active role in overseeing the implementation of the many recent changes to high cost and low-income programs. He has also played an important role in explaining those changes to the community of advocates and service providers who are concerned with the Lifeline and Link-up programs.

In his work for Advocates for Basic Legal Equality, Inc., formerly known as the Legal Aid Society of Dayton, Mr. Jacobs represents low-income consumers. With regard to public utility matters, and specifically telecommunications matters, he has been primarily active as the attorney for the Edgemont Neighborhood Coalition, a non-profit, charitable organization with an office in an inner city neighborhood of Dayton. The Coalition provides a variety of services to Edgemont residents, and works to expand education and economic opportunities and improve the quality of life for all residents of the neighborhood. The Coalition also functions as a small business, operating an office, storefront, community garden and community computer center.

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I have known Mr. Jacobs for approximately twenty years or more, and have been fortunate in having had the opportunity to work with him on public utilities issues impacting Ohioans. Mr. Jacobs is conscientious, hard-working and dedicated to serving the public interest. He approaches issues with intelligence and is open to considering the views of other stakeholders. Based on his work on the USAC Board and his background of service to low-income individuals, Mr. Jacobs would be an excellent choice as the representative of low-income consumers on the Board. I appreciate the opportunity to nominate Mr. Jacobs for another term on the USAC Board. I understand that a number of interested organizations will also be supporting Mr. Jacobs' nomination.

Sincerely,

*/s/ Bruce J. Weston*

Bruce J. Weston  
Ohio Consumers' Counsel

BJW/pjm

Enclosure

Cc: Erica Myers, FCC  
Charles Tyler, FCC

**ELLIS JACOBS**  
131 E. Davis Street  
Yellow Springs, OH 45387  
Phone: (937) 535-4419  
Fax: (937) 449-8131  
Ejacobs@ablelaw.org

**BAR ADMISSIONS**

Admitted to Ohio and Federal Bars, November 1981

**EDUCATION:**

University of Dayton School of Law - Dayton, Ohio  
J.D. Degree, June 1981  
Capital University, UWW - Columbus, Ohio  
B.A. 1978

**EMPLOYMENT:**

ADVOCATES FOR BASIC LEGAL EQUALITY, INC.  
Dayton, Ohio  
Senior Attorney  
(December, 2003 – Present)  
Utility Regulation, Environmental Law, Voting Rights.

LEGAL AID SOCIETY OF DAYTON, INC.  
Dayton, Ohio  
Litigation Director/Chief Counsel/ Managing Attorney  
(May 1987 – December, 2003)  
Utility Regulation and Environmental Law.

CITY OF DAYTON  
Dayton, Ohio  
Magistrate  
(September 1985 - May 1987)  
Presided over the city's landlord/tenant court, heard a variety of  
other cases referred by municipal judges.

MONTGOMERY COUNTY PUBLIC DEFENDERS OFFICE  
Dayton, Ohio  
Senior Appellate Attorney  
(November 1983 - September 1985)  
Trial Attorney  
(November 1981 - November 1983)

MONTGOMERY COUNTY FAIR HOUSING CENTER  
Dayton, Ohio  
(May 1981 - November 1981)  
Civil rights litigation, landlord/tenant law.

UNIVERSITY OF DAYTON SCHOOL OF LAW  
Visiting Professor, Law Clinic  
Spring 2001, Fall 2003

ANTIOCH UNIVERSITY  
Visiting Professor, Business Law  
Spring 2001, Fall 2002

SINCLAIR COMMUNITY COLLEGE  
Instructor, Business Law  
1987

UNITED STATES DEPARTMENT OF COMMERCE  
Grant Reviewer, Technology Opportunities Program,  
2002

**RELEVANT  
EXPERIENCE:**

UNIVERSAL SERVICE ADMINISTRATIVE COMPANY  
BOARD OF DIRECTORS, (2009- Present) Representative of low  
income customers, member high cost/low income committee.

ATLANTIC FELLOWSHIP IN PUBLIC POLICY  
Fellow, Office of Telecommunications (OFTEL),  
London, England  
(August 2001 – January 2002)  
As part of a British Government sponsored fellowship program,  
worked and studied at OFTEL, the British equivalent of the FCC.  
While working on several projects for OFTEL, researched and  
wrote, “British Universal Service Policy in the Era of Mobile  
Madness”, presented at the Atlantic Fellowship Conference,  
London England, May 2002.

TELEPHONE AND TECHNOLOGY ACCESS PROJECT  
Director (1995 – 2003)  
Provided public interest advocacy for the low-income community  
on telecommunication issues. This included representation in  
alternative regulation, merger, service quality and prepaid  
provider cases and involvement in universal service, local

competition and minimum service standard rules dockets.

#### OHIO COMMUNITY COMPUTING CENTER NETWORK

Board Member (1995 – 2004)

Chair (1995 – 1998)

The OCCN provides support to a network of computer centers in low income communities throughout Ohio, including centers funded as the result of settlements in the Ameritech and Cincinnati Bell Telephone alternative regulation and merger cases.

#### UNIVERSAL SERVICE ASSISTANCE ADVISORY COMMITTEE

Board Member (1995 – 2006)

Chair (1996 – 1998)

This committee oversaw the implementation of the low-income lifeline program in the Ameritech-Ohio service territory. In 2004 this group merged into “Lifeline Ohio”.

#### COMMUNITY TECHNOLOGY FUND OF OHIO

Board Chair (1999 – 2006)

This fund provided grants to help organizations in low-income communities effectively use telecommunications and computer technology. This fund resulted from the settlement of a merger case and was overseen by the Public Utilities Commission of Ohio. It expired in 2006 when it completed oversight of all grants.

#### **SELECTED PUBLICATIONS:**

Ellis Jacobs, “Legal Aid’s Role in the Fight for Telecommunications and Computer Access in Low-income Communities,” *Clearinghouse Review*, Vol. 37, Number 3, August 2003.

Gabrielle Hammond and Ellis Jacobs, “The Future of Technology in Legal Services: A Time for New Advocacy,” *Clearinghouse Review*, Vol. 37, Number 1-2, May-June 2003.

Ellis Jacobs, “Fighting to Turn the Promise of Universal Telecommunications Technology Service into Reality: The Experience of one Community Organization in Ohio,” *Georgetown Journal on Poverty Law and Policy*, Vol. VIII, Number 1, Winter 2001.

Ellis Jacobs, Cary Williams, “Telecommunications Policy in Ohio: Interventions to Bridge the Digital Divide,” *Quarterly*

Bulletin, National Regulatory Research Institute, Vol. 20, Number 3, Fall/Winter 1999.

Ellis Jacobs, "Expanding Low-Income Communities' Access to Telecommunications Technology," Clearinghouse Review, Vol. 29, Number 3, July 1995.

**SELECTED  
PRESENTATIONS:**

"First Do No Harm; Representing Community Organizations," National Legal Aid and Defender Association, San Jose, California, July, 2006.

"Systemic Advocacy in the Digital Age," National Legal Aid and Defender Association, Milwaukee, Wisconsin, November 2002.

"British Universal Service Policy in the Era of Mobile Madness", Atlantic Fellowship in Public Policy Conference, London, England, May, 2002.

"Overcoming the Digital Divide," National Legal Aid and Defender Association, Washington DC, November 2000.

"The Digital Divide and Low Income Communities Access to Technology," Ohio State Legal Services, Columbus Ohio, October 2000.

"Universal Service Advocacy," National Legal Aid and Defender Association, Houston, Texas, April 2000.

"Advancing the Public Interest before State Utility Commissions," Community Technology Centers' Network, Boston, Massachusetts, June, 1996.

"Lessons from the World of Telecommunications," National Consumer Law Center, Washington, D.C., February, 1996.

"National and Local Telecommunications Agendas: Advancing the Public Interest in a Changing Environment," Center for Neighborhood Technology, Chicago, Illinois, November, 1995.